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Attorneys for Debtor, Tulare Local Healthcare District,  
dba Tulare Regional Medical Center

IN THE UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF CALIFORNIA  
FRESNO DIVISION

In re

TULARE LOCAL HEALTHCARE  
DISTRICT, dba TULARE  
REGIONAL MEDICAL CENTER,

Debtor.

Tax ID #: 94-6002897  
Address: 869 N. Cherry St.  
Tulare, CA 93274

CASE NO. 17-13797

Chapter 9

DC No.: WW-35

Date: May 17, 2018  
Time: 9:30 a.m.  
Place: 2500 Tulare Street  
Fresno, CA 93721  
Courtroom 13  
Judge: Honorable René Lastreto II

**DECLARATION OF RILEY C. WALTER IN SUPPORT OF MOTION FOR ORDER  
APPROVING AGREEMENT RELATING TO RELIEF FROM THE AUTOMATIC STAY  
(MEC)**

I, Riley C. Walter, hereby declare and represent as follows:

1. My name is Riley C. Walter. I am attorney at Walter Wilhelm Law Group ("W2LG") which is counsel for the Debtor. This proceeding was commenced by the filing of a voluntary petition.
2. W2LG maintains an office at 205 E. River Park Circle, Suite 410, Fresno, California 93720.

1           3.     I have personal knowledge that the facts set forth in this declaration are  
2 true, except on those matters stated on information and belief, which I believe to be  
3 true. If I were called as a witness in connection with this proceeding, I could and would  
4 testify competently to the matters stated herein.

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6           4.     I have personally reviewed the Motion for Order Approving Stipulation for  
7 Relief From Stay ("Motion") which seeks an order pursuant to 11 U.S.C. §§ 901 and 362  
8 as complimented by FRPB 4001(d) approving the Stipulation for Relief From the  
9 Automatic Stay ("Stipulation") entered into between the Debtor and Tulare Regional  
10 Medical Center Medical Staff ("Plaintiff Medical Staff").

11           5.     As stated in the Motion and Stipulation, prior to the Petition Date, Plaintiff  
12 Medical Staff initiated a lawsuit against TRMC, Professional Medical Staff of Tulare  
13 Regional Medical Center ("Replacement Medical Staff"), and Healthcare Conglomerate  
14 Associates, LLC ("HCCA") for violation of the Ralph M. Brown Act; violation of the  
15 Medical Practices Act; certain Health and Safety Code violations, and declaratory relief  
16 ("Plaintiff Medical Staff's Claims"), in the matter styled *Tulare Regional Medical Center*  
17 *Medical Staff v. Tulare Local Healthcare District, dba Tulare Regional Medical Center,*  
18 *Healthcare Conglomerate Associates, LLC, Professional Staff of Tulare Regional*  
19 *Medical Center, and Does 1 through 100, inclusive, Tulare County Superior Court case*  
20 *no. VCU 264227* (the "Lawsuit").

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23           6.     After negotiation, TRMC, Plaintiff Medical Staff, Replacement Medical  
24 Staff, and HCCA (collectively, the "Parties") are very close to reaching an agreement on  
25 a final stipulated judgment, to be entered by the Tulare County Superior Court, which  
26 would resolve all of the claims encompassed by the Lawsuit.

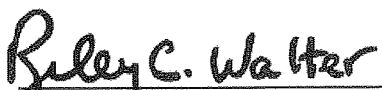
27           7.     Relief from the automatic stay is required in order for the Parties to finalize  
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1 negotiations and conclude the Lawsuit.

2 8. Accordingly, TRMC and Plaintiff Medical Staff have stipulated to terms  
3 and conditions concerning the relief required to lift the stay to allow the Lawsuit to  
4 continue for the sole purpose of entering a final judgment and order for equitable and  
5 other relief ("Stipulation").  
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7 I declare under penalty of perjury under the laws of the United States of America  
8 that the foregoing is true and correct to the best of my information and belief.

9 Executed this 3rd day of May, 2018, at Fresno, California.

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12 Riley C. Walter  
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